

ORLOFF, LOWENBACH, STIFELMAN & SIEGEL, P.A.

Attorneys at Law

Joel D. Siegel*
Laurence B. Orloff*
Stanley Schwartz*
Jeffrey M. Garrod*
Samuel Feldman*
Edmund A. Mikalauskas
Susan M. Holzman*
William J. Adelson*
Eugenia Yudanin*
Philip C. Corbo*
Adam M. Haberfield
Craig A. Ollenschleger
David Gorvitz*
Marc C. Singer†

44 Whippany Road - Suite 100
Morristown, New Jersey 07960
973.622.6200 • Fax: 973.622.3073

800 Third Avenue - Suite 2800
New York, New York 10022
212.220.4081
www.olss.com

September 24, 2020

Laura N. Wilensky*
Xiao Sun*
Devin A. Cohen*
Alexander S. Firsichbaum*
Samantha T. Alexander*
Edward J. Pudup*
Alexander B. Imelt†

Of Counsel
Ralph M. Lowenbach*
Floyd Shapiro
Sanders M. Chattman

Frank L. Stifelman
1937-2015

*MEMBER NJ & NY BARS
†MEMBER NJ, NY & PA BARS

Refer To File No.
102371-001

BY ECF

Hon. Naomi Reice Buchwald, U.S.D.J.
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Verano Development, Inc. v. Bolivarian Republic of Venezuela
1:20-CV-03266-NRB

Dear Judge Buchwald:

As Your Honor might recall, this firm, on behalf of the plaintiff Verano Development, Inc. filed a complaint against the defendant, Bolivarian Republic of Venezuela.

This firm and a plaintiff have agreed to part company and end this firm's involvement in this matter on behalf of the plaintiff. The defendant has never answered and indeed, apparently closed up shop as shown in the Affidavit of Service thereby impeding attempts to make service upon it pursuant to the terms of the underlying agreement.

Under the circumstances, and to avoid generating a lot of unnecessary paperwork, we respectfully request that the Court authorize us to submit an order withdrawing our appearance on behalf of the plaintiff and giving the plaintiff 30 days to find replacement counsel.

ORLOFF, LOWENBACH, STIFELMAN & SIEGEL, P.A.

Hon. Naomi Reice Buchwald, U.S.D.J. -2-

September 24, 2020

If Your Honor is inclined not to grant such a relief, we will file a motion for withdrawal.

Respectfully,

/s/Samuel Feldman
SAMUEL FELDMAN

SF/lam

cc: Mr. Alexander Neuhauser (by email)